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Capital Partners, L.P and Benchmark Capital
Management Co. LLC

[additional stipulating parties on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NEXTDOOR.COM, INC., a Delaware
corporation,

Plaintiff,

vs.

RAJ ABHYANKER, an individual,

Defendant.

CASE NO. 3:12-cv-05667-EMC

**STIPULATION AND ~~[PROPOSED]~~ ORDER
FOR VOLUNTARY DISMISSAL WITH
PREJUDICE OF DEFENDANT AND
COUNTERCLAIMANT RAJ ABHYANKER'S
COUNTERCLAIM FOR MISAPPROPRIATION
OF TRADE SECRETS AGAINST
COUNTERDEFENDANTS BENCHMARK
CAPITAL PARTNERS, L.P., BENCHMARK
MANAGEMENT CO., LLC, SANDEEP SOOD,
AND MONSOON ENTERPRISES, INC.**

Case Filed: November 5, 2012

Judge: Honorable Edward M. Chen

(Caption continues next page)

1 RAJ ABHYANKER, an individual,

2 Counterclaimant,

3 vs.

4 NEXTDOOR.COM, INC., a Delaware
corporation; PRAKASH
5 JANAKIRAMAN, an individual;
BENCHMARK CAPITAL PARTNERS,
6 L.P., a Delaware limited partnership;
BENCHMARK CAPITAL
7 MANAGEMENT CO. LLC,
a Delaware limited liability company;
8 SANDEEP SOOD, an individual;
MONSOON ENTERPRISES, INC., a
9 California corporation, and DOES 1-50,
inclusive,

10 Counterdefendants.
11

STIPULATION OF DISMISSAL

WHEREAS, on April 12, 2013, Defendant and Counterclaimant Raj Abhyanker (“Abhyanker”) filed a First Amended Answer and Counterclaims [Dkt. No. 59] (“FACC”), asserting a counterclaim for trade secret misappropriation against Sandeep Sood and Monsoon Enterprises, Inc. (together, “Monsoon”) and Benchmark Capital Partners, L.P. and Benchmark Capital Management Co., LLC (together, “Benchmark”);

WHEREAS, on August 2, 2013, Monsoon answered the FACC [Dkt. No. 104];

WHEREAS, on December 5, 2013, Abhyanker filed a Second Amended Answer and Counterclaims [Dkt. No. 132] (“SACC”), asserting a counterclaim for trade secret misappropriation against Monsoon and Benchmark;

WHEREAS, on June 5, 2014, Benchmark answered the SACC [Dkt. No. 209];

WHEREAS, Abhyanker wishes to dismiss and release all claims against Monsoon, and each of its present and former partners, members, directors, officers, employees, subsidiaries, affiliates, predecessors, successors, insurers, attorneys, stockholders and agents (the “Monsoon Related Parties”), based on the facts and circumstances alleged in the FACC and SACC;

WHEREAS, Abhyanker wishes to dismiss and release all claims against Benchmark, and each of its present and former partners, members, directors, officers, employees, subsidiaries, affiliates, funds, predecessors, successors, insurers, attorneys, stockholders and agents (the “Benchmark Related Parties”), based on the facts and circumstances alleged in the FACC and SACC;

Pursuant to Federal Rule of Civil Procedure 41(a), the parties stipulate and agree as follows:

1. Abhyanker hereby dismisses with prejudice all claims or counterclaims against Benchmark and Monsoon in the above-captioned action;
2. Abhyanker releases all claims against the Benchmark Related Parties and the Monsoon Related Parties, whether known or unknown, based on the facts and circumstances set forth in the FACC and SACC;

3. Abhyanker shall not take any further discovery of Benchmark or Monsoon in the above-captioned action, and all pending discovery requests to Benchmark and Monsoon, including but not limited to document requests, interrogatories, and deposition notices, are hereby withdrawn;
4. Abhyanker shall have no further obligation to respond to pending discovery requests promulgated by Benchmark or Monsoon; and
5. The parties shall bear their own fees and costs.

IT IS SO STIPULATED.

Dated: June 6, 2014

Respectfully submitted,

LEGALFORCE RAJ ABHYANKER, P.C.

By /s/ Bruno W. Tarabichi

Bruno W. Tarabichi
Heather Norton
Scott J. Allen
Alex Rudd
Brian Orion

Attorneys for Defendant and
Counterclaimant Raj Abhyanker

Dated: June 6, 2014

Respectfully submitted,

LATHAM & WATKINS LLP

By /s/ Matthew Rawlinson

Matthew Rawlinson
Julian W. Park

Attorneys for Counterdefendants
Benchmark Capital Partners, L.P., and
Benchmark Capital Management Co. LLC

Dated: June 6, 2014

Respectfully submitted,

ROYSE LAW FIRM, P.C.

By /s/ Harpeet S. Walia

Harpreet S. Walia
Lisa M. Chapman
Michael Wiesner

Attorneys for Counterdefendants Sandeep
Sood and Monsoon Enterprises, Inc.

ATTESTATION

Pursuant to Civil Local Rule 5-1, I certify that I obtained in the filing of this document the concurrence from all parties whose electronic signatures appear above.

Dated: June 6, 2014

/s/ Matthew Rawlinson

Matthew Rawlinson

IT IS SO ORDERED.

Dated: 6/9/14

